

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) MICHAEL P. AYALA,
[DOB: 07-08-1978],

(02) RONDA L. EASTON,
[DOB: 12-13-1962],

(03) STEVEN A. EASTON,
[DOB: 01-20-1967],

(04) JAMES M. PARKER,
[DOB: 04-11-1970],

(05) ROBERT M. CARDENAS, JR.,
[DOB: 01-17-1988],

(06) MICHAEL D. THOMPSON,
[DOB: 12-31-1958],

(07) CODY D. KELLER,
[DOB: 10-15-1982],

and

(08) DAVID M. CLIMER,
[DOB: 04-21-1979],

Defendants.

Defendants/Counts:

(01) Ayala: 1, 8, 9 and FAs 1 and 2

(02) R. Easton: 1, 2, 3, 4 and FAs 3 and 4

(03) S. Easton: 1

(04) Parker: 1 and 7

(05) Cardenas, Jr.: 1

(06) Thompson: 1

(07) Keller: 1 and 5

(08) Climer: 1 and 6

No. 15-03051-01/08-CR-S-MDH

COUNT 1

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 2 and 5

21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 Million Fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 3 and 8

18 U.S.C. § 924(c)
NLT 5 Years Imprisonment
NMT Life Imprisonment
Consecutive Sentence
NMT \$250,000 Fine
NMT 5 Years Supervised Release
Class A Felony

COUNTS 4 and 9

18 U.S.C. §§ 922(g)(1) and 924(a)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS 6 and 7

21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1 Million Fine
NLT 3 Years Supervised Release
Class C Felony

FORFEITURE ALLEGATIONS 1 and 3
21 U.S.C. § 853

FORFEITURE ALLEGATIONS 2 and 4
18 U.S.C. § 924(d)

\$100 Special Assessment (Each Count)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Between January 1, 2013, through April 16, 2015, said dates being approximate, in Greene County, in the Western District of Missouri and elsewhere, the defendants, **MICHAEL P. AYALA, RONDA L. EASTON, STEVEN A. EASTON, JAMES M. PARKER, ROBERT M. CARDENAS, JR., MICHAEL D. THOMPSON, CODY D. KELLER, and DAVID M. CLIMER**, knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

COUNT 2

On or about January 5, 2015, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **RONDA L. EASTON**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 3

On or about January 5, 2015, in Greene County, in the Western District of Missouri, **RONDA L. EASTON**, the defendant, knowingly possessed a Taurus brand, Circuit Judge model, .410 caliber shotgun, serial number EP2989, and a Cobra brand, CA-380 model, .380 caliber, semi-automatic pistol, serial number CP061629, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 4

On or about January 5, 2015, in Greene County, in the Western District of Missouri, **RONDA L. EASTON**, the defendant, having been convicted of a crime which is punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms and ammunition, that is, a Taurus brand, Circuit Judge model, .410 caliber shotgun, serial number EP2989, a Cobra brand, CA-380 model, .380 caliber, semi-automatic pistol, serial number CP061629, and ammunition, which have been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

On or about January 5, 2015, in Greene County, in the Western District of Missouri, **CODY D. KELLER**, the defendant, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 6

On or about January 5, 2015, in Greene County, in the Western District of Missouri, **DAVID M. CLIMER**, the defendant, knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 7

On or about March 5, 2015, in Greene County, in the Western District of Missouri, **JAMES M. PARKER**, the defendant, knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 8

On or about April 16, 2015, in Greene County, in the Western District of Missouri, **MICHAEL P. AYALA**, the defendant, knowingly possessed a firearm, that is, a Springfield Armory, XD-9 model, 9mm, semi-automatic pistol, serial number US144188, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 9

On or about April 16, 2015, in Greene County, in the Western District of Missouri, **MICHAEL P. AYALA**, the defendant, having been convicted of a crime which is punishable by

imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm and ammunition, that is, a Springfield Armory, XD-9 model, 9mm, semi-automatic pistol, serial number US144188; and ammunition, which have been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION 1

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **MICHAEL P. AYALA** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Real property located at 2237 N. National Avenue, Springfield, Missouri, with all appurtenances, improvements, and attachments thereon. The legal description of this property is as follows:

All of Lot Number 5, in Block Number 2, in Hobart's Third Addition, to the City of Springfield, Greene County, Missouri;
2. A Springfield Armory, XD-9 model, 9mm, semi-automatic pistol, serial number US144188, seized on or about April 16, 2015;
3. A 9mm magazine seized on or about April 16, 2015;
4. Miscellaneous rounds of ammunition seized on or about April 16, 2015; and

5. Approximately \$19,231 in United States currency, seized on or about April 16, 2015.

FORFEITURE ALLEGATION 2

The allegations contained in Counts 8 and 9 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

As a result of being convicted of an offense in violation of Title 18, United States Code, Sections 924(c) and 922(g)(1), as charged in Counts 8 and 9, **MICHAEL P. AYALA**, the defendant, shall forfeit to the United States all firearms and ammunition involved in the commission of the offenses charged in Counts 8 and 9, including but not limited to, the following:

1. A Springfield Armory, XD-9 model, 9mm, semi-automatic pistol, serial number US144188, seized on or about April 16, 2015;
2. A 9mm magazine seized on or about April 16, 2015; and
3. Miscellaneous rounds of ammunition seized on or about April 16, 2015.

FORFEITURE ALLEGATION 3

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **RONDA L. EASTON**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds

obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. A 1991 Mercedes-Benz, VIN #WDBFA66EXMF021372, seized on or about February 4, 2015.
2. A Taurus brand, Circuit Judge model, .410 caliber shotgun, serial number EP2989 seized on or about January 5, 2015;
3. A Cobra brand, CA-380 model, .380 caliber, semi-automatic pistol, serial number CP061629 seized on or about January 5, 2015;
4. Miscellaneous rounds of ammunition seized on or about January 5, 2015; and
5. Approximately \$16,299 in United States currency, seized on or about January 5, 2015.

FORFEITURE ALLEGATION 4

The allegations contained in Counts 3 and 4 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

As a result of being convicted of an offense in violation of Title 18, United States Code, Sections 924(c) and 922(g)(1), as charged in Counts 3 and 4, **RONDA L. EASTON**, the defendant, shall forfeit to the United States all firearms and ammunition involved in the

commission of the offenses charged in Counts 3 and 4, including but not limited to, the following:

1. A Taurus brand, Circuit Judge model, .410 caliber shotgun, serial number EP2989 seized on or about January 5, 2015;
2. A Cobra brand, CA-380 model, .380 caliber, semi-automatic pistol, serial number CP061629 seized on or about January 5, 2015; and
3. Miscellaneous rounds of ammunition seized on or about January 5, 2015.

A TRUE BILL

/s/
FOREPERSON OF THE GRAND JURY

/s/ *Nhan D. Nguyen*
Nhan D. Nguyen
Special Assistant United States Attorney

DATED: 06/17/2015
Springfield, Missouri